

Message

From: Ramasamy, Santhini [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=F078B65256DE4C22A8EC9D9F9720715F-SRAMASAM]
Sent: 12/22/2017 12:56:43 PM
To: Bahadori, Tina [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=7da7967dcafb4c5bbc39c666fee31ec3-Bahadori, Tina]
Subject: FW: IRIS Prog

Happy Holidays Tina. In case you did not see this...
Santhini

From: Ramasamy, Santhini
Sent: Friday, December 22, 2017 7:56 AM
To: Bussard, David <Bussard.David@epa.gov>; Hagerthey, Scot <Hagerthey.Scot@epa.gov>; Morozov, Viktor <Morozov.Viktor@epa.gov>
Cc: Bierwagen, Britta <Bierwagen.Britta@epa.gov>; Saint, Chris <Saint.Chris@epa.gov>
Subject: IRIS Prog

FYI-Hope the Congress hears AG's concerns before making drastic decisions for IRIS budget.

Daily News

Democratic AGs Fight Against EPA FY18 Funding Cuts, Shuttering IRIS

December 21, 2017

Democratic state attorneys general (AGs) are mounting a defense of EPA's overall budget and specific programs against proposed cuts in Republicans' fiscal year 2018 spending bills, including a warning that the GOP's bid to eliminate the Integrated Risk Information System (IRIS) risk assessment program could hamstring drinking water protections.

In a [Dec. 21 letter](#) to Republican and Democratic leaders in both chambers of Congress, 13 Democratic state AGs urge against passing an FY18 spending bill based on either the House or Senate's proposed legislation. The letter reinforces Democrats' recent hard-line stance on EPA funding, after 40 Senators vowed to filibuster any budget measure that includes policy riders even if it means shutting down the government.

"The deep and damaging budget cuts and anti-environmental riders that the House-passed budget bill and the Senate Appropriations Committee Chairman's budget propose, if adopted, would profoundly undermine EPA and its vital mission of protecting public health and the environment. We strongly urge Congress to reject that approach and instead pass a budget for EPA that fully funds its programs and omits any anti-environmental riders," reads the AGs' letter, which is addressed to Speaker of the House Paul Ryan (R-WI), House Minority Leader Nancy Pelosi (D-CA), Senate Majority Leader Mitch McConnell (R-KY) and Senate Minority Leader Chuck Schumer (D-NY).

The Dec. 21 letter deals mainly with full-year FY18 appropriations bills, rather than the expected [interim measure](#) that the GOP is likely to push to avert a shutdown when current funding for the federal government expires at the end of Dec. 22, and which faces a filibuster threat over potential policy riders that would delay or eliminate high-profile Obama-era rules such as the national air standard for ozone. Along with an overall push for maintaining EPA's current budget of roughly \$8.05 billion, which the House's spending bill would cut to \$7.4 billion and the Senate's proposed legislation to \$7.91 billion, the AGs urge Congress to ensure environmental enforcement is fully funded, and to preserve IRIS -- which Republicans have sought to eliminate entirely in some proposals.

They argue that any reduction to EPA's funding or elimination of its programs will impact states' ability to implement environmental laws, by either diminishing federal monetary support for their work or forcing them to take on new responsibilities if EPA scales back its own activities.

"Stripping hundreds of millions of dollars from EPA's core programs and depleting its workforce would hamstring the Agency, and directly jeopardize not only its central activities but also the partnership that our states depend upon," the letter says.

IRIS Assessments

The AGs specifically identify the proposed elimination or scaling-back of IRIS as a move that could, if successful, have significant adverse environmental impacts. IRIS is influential in the scientific and regulatory communities, but often controversial thanks to what is seen as the slow pace of its chemical assessments and calls to restructure the program.

Since the first months of the Trump administration, it has become a target for either termination or extreme reduction in GOP budget proposals, with the White House and Senate each suggesting to preserve IRIS in a limited form that would be tasked with assessing substances under the revised Toxic Substances Control Act (TSCA) and other mandatory regulatory programs.

But the AGs argue that scaling down IRIS would handicap EPA's drinking water protections, because a version of the program limited to TSCA would be forced to drop its work under the Safe Drinking Water Act, such as the current project to study health hazards from the emerging contaminants perfluorooctanoic acid (PFOA) and perfluorooctane sulfonate (PFOS). Eliminating IRIS "will likely impede or block" development of drinking water standards for those substances, the letter says.

It continues that if IRIS is refocused solely on TSCA, "it is likely the work of the Office of Water -- which uses IRIS to set national drinking water standards -- will be significantly impacted . . . As a result, the elimination or reduction of the IRIS program will likely delay, if not end, progress toward effective, science-based regulation of these dangerous chemicals, and toward ensuring the health and safety of the water Americans drink."

The AGs also defend the program on its overall merits, praising it as "critical" in waste cleanups, air toxics assessments and other points of environmental policy that they say would suffer if IRIS is ended.

"Information generated by the IRIS program is critical to the development and implementation of many federal, state, and local public health protection activities. The cleanup of hazardous waste sites, performance of emergency and rapid response, and assessment of risks from air emissions, and establishment of drinking water standards all depend on IRIS. The elimination of IRIS will undermine these activities -- thereby directly imperiling the health and safety of our residents," the letter says.

EPA Enforcement

On enforcement, the AGs urge against adopting proposed cuts to EPA's compliance office, which they say stand at about 15 percent of current levels in the House FY18 bill and 10 percent in the Senate's version.

"Cutting EPA's enforcement budget threatens to remove the federal law enforcement 'floor,' creating a situation where violations of federal law are enforced differently in different states. This would create competitive imbalances for businesses and catalyze a 'race to the bottom' by states toward providing reduced public health and environmental protections. Such a race to the bottom can have particularly severe and adverse impacts on disadvantaged communities," the letter says.

It continues that "There is already evidence of a troubling retreat" on enforcement under the Trump administration, citing early statistics released by watchdog groups that showed dips in new enforcement cases and settlements compared to prior administrations.

"This reduction of core enforcement activity is directly at odds with the EPA Administrator's stated 'back to basics' agenda. Any reduction by Congress in the budget for enforcement would send the wrong message to the Agency, which instead should be told that Congress strongly supports the EPA's enforcement of this nation's environmental laws," the letter says. — *David LaRoss*

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